

# Carl R. Todd

## Notice of Intent to Invoke Administrative Sanctions

DATE: June 2, 2003 RESPONDENT: Carl R. Todd of Belton, Missouri

ALLEGATIONS: Unregistered Broker-Dealer; Sale of Unregistered Securities; Unlawful Acts in the Sale of Securities

ORDER: Notice of Intent to Invoke Administrative Sanctions Under the Kansas Securities Act alleging Carl Todd promoted an investment opportunity, the Equity Sales Program, encouraging individuals to mortgage their residential property and invest the money in a Universal Lease paying up to 11%. The anticipated return on investment is 5% or more. Todd allegedly represented that the product was authorized by his employers, Resort Holdings International and Yucatan Resorts. Resort Holdings and Yucatan deny that this was an authorized product but admit that it is a security. The Notice alleges that neither the security nor Todd were registered in the State of Kansas and that Todd's misrepresentation that the program was authorized by Resort Holdings and Yucatan constitutes an unlawful act in connection with the sale of a security.

**Notice to Investors:** If you are not a resident of Kansas and have been affected by actions that are similar to those described in this synopsis, you should consider contacting your state securities regulator for assistance. To locate your securities regulator, go to the [North American Securities Administrators Association](#) website. If you choose to contact your state securities regulator, please inform him or her of the action taken by the State of Kansas.